

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

RANDY GAMEL-MEDLER	)	
	)	
PLAINTIFF,	)	
	)	
	)	
v.	)	Case No. CIV-17-830-HE
	)	
JONITA PAULS a/k/a	)	
JONITA JACKS,	)	
JOEL PAULS,	)	
RENITA PAULS,	)	
MERADITH NORRIS,	)	
RICK EDSALL,	)	
KENNY MEIER,	)	
TONY ALMAGUER, individually	)	
and in his capacity as Sheriff	)	
of Blaine County,	)	
DAVID ROBERTSON, individually	)	
and in his capacity as	)	
Undersheriff of Blaine County	)	
	)	
DEFENDANTS.	)	

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

The parties jointly move the Court to enter the accompanying Agreed Protective Order Governing Confidential Information and Documents. This protective order specifies the conditions under which private, sensitive, and/or legally confidential documents and information in possession of the parties must be exchanged, used, and protected in this litigation, and authorizes the parties to disclose that information in response to discovery requests. This protective order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case law and is necessary in order for the

parties to obtain relevant and essential discovery. Prompt entry of this order authorizing the parties to disclose such records is necessary for the conduct of discovery in this action. The parties, therefore, respectfully request that the attached Agreed Protective Order Governing Confidential Information and Documents be adopted by order of the Court.

Respectfully submitted,

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